

Pamela M. Egan, WSBA No. 54736
POTOMAC LAW GROUP PLLC
2212 Queen Anne Ave. N., #836
Seattle, WA 98109
Telephone: (415) 297-0132
Email: pegan@potomaclaw.com
Attorneys for Mark D. Waldron, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 7

The Honorable Frederick P. Corbit

Chapter 7

**DECLARATION OF PAMELA M.
EGAN IN SUPPORT OF
CHAPTER 7 TRUSTEE'S REPLY
TO RESPONSES TO FIRST,
SECOND, AND THIRD OMNIBUS
OBJECTION TO CLAIMS
(RELEASED)**

Pamela M. Egan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this declaration.

2. I am a partner in the Potomac Law Group PLLC which is the court-appointed bankruptcy counsel for Mr. Waldron in his capacity as the Chapter 7 Trustee.

3. I submit this declaration in support of the *Chapter 7 Trustee's Reply to Responses to First, Second, and Third Omnibus Objection to Claims (Released)* (the "Reply"), filed herewith.

Declaration of Pamela M. Egan in Support
of Chapter 7 Trustee's Reply to Responses
to First, Second, and Third Omnibus
Objection To Claims (Released)

Page | 1

1 4. The statements made herein are based on my communications with
2 seven WTT token holders who confirmed that Mr. Dam had contacted them
3 regarding the Omnibus Objections.

4 5. Exhibit A to the Reply is a true and correct copy of an email that a
5 WTT Token holder forwarded to me. This WTT Token holder stated that Mr.
6 Dam had sent it to him. Another WTT Token holder sent me the content of the
7 same email, Exhibit A, without forwarding the entire email, but confirming that it
8 was sent by Mr. Dam.

9 6. The WTT Token holders with whom I communicated also confirmed
10 that Mr. Dam held a call to discuss the issues raised in Mr. Dam's email, Exhibit
11 A.

12 7. Exhibit B to the Reply is a true and correct copy of another email that
13 a WTT Token holder received from Mr. Dam and forwarded to me. This WTT
14 Token holders' identifying information is redacted. If Mr. Dam contests that he
15 sent this email, the sender's identity can be provided to the Court.

16 8. Exhibit B includes a link to the "joinder" that Mr. Dam encouraged
17 WTT Token holders to file. I clicked on the link and retrieved the joinder. It is
18
19
20
21
22

1 included with Exhibit B. Mr. Lignos' response to the Omnibus Objection was
2 attached to the email and is included with Exhibit B.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed on this 19th day of November 2024 in Seattle, Washington.

5
6 /s/ Pamela M. Egan

7 Pamela M. Egan
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

23 Declaration of Pamela M. Egan in Support
24 of Chapter 7 Trustee's Reply to Responses
25 to First, Second, and Third Omnibus
Objection To Claims (Released)

Page | 3